

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Pedro Ramirez Jr.

YOB:

PRINCIPAL  
1995United States Courts  
Southern District of Texas

Case Number:

United States

FILED

M-18- 0739 -M

04/07/2018

David J. Bradley, Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 5, 2018 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact Armando Aurelio Patricio Chanax-Ajitas, a citizen of Guatemala, and Rovinson Ortiz-Lala, a citizen of Ecuador, along with ten (10) other undocumented aliens, for a total of twelve (12), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Alamo, Texas to the point of arrest near Alamo, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY  
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On April 5, 2018, Border Patrol Agents working on Military Highway 281 near Alamo, Texas, observed a red Chevrolet Suburban traveling south on Tower Road. This area is commonly used by human smugglers to pick up undocumented aliens and is approximately 500 yards away from the Rio Grande River.

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on April 07, 2018.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

/s/ Salvador Mendez

Signature of Complainant

Sworn to before me and subscribed in my presence,

Salvador Mendez Senior Patrol Agent

Printed Name of Complainant

April 7, 2018

Date

at McAllen, Texas

City and State

J Scott Hacker

, U. S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-18- 0739 -M**

**RE: Pedro Ramirez Jr.**

**CONTINUATION:**

Immediately after the Suburban reached the levee, agents observed several suspected undocumented aliens jump inside. As mobile agents approached the area, the Suburban sped off eastbound on the levee and recklessly traveled a short distance before driving off the levee embankment.

Agents approached the Suburban and observed several subjects exiting and running away from it. Agents managed to apprehend two subjects as they attempted to flee. Additional agents responded and managed to apprehend six subjects attempting to hide in the brush. One male subject, later identified as Pedro Ramirez Jr., a United States Citizen, was encountered as he was breaking his cell phone. As Ramirez was being escorted out of the brush, he freely admitted to being the driver of the Suburban. Additionally, Ramirez asked the agent what would agents have done if he had "drawn down" on them.

Agents searched the area where the Suburban picked up the suspected undocumented aliens and managed to apprehend five additional subjects hiding in the brush. In total, 12 subjects were determined to be illegally present in the United States.

A search of the Suburban revealed an unloaded .380 caliber handgun within arm's reach. In addition, one ammunition round was discovered in the driver's side door panel.

All subjects were transported to the Weslaco Border Patrol Station to be processed accordingly.

**PRINCIPAL STATEMENT:**

Pedro Ramirez Jr. was read his Miranda Rights. He understood and agreed to provide a sworn statement without the presence of an attorney.

Ramirez stated he was hired to pick up illegal aliens by a smuggler from Mexico. Ramirez indicated he was going to transport the undocumented aliens to another location and was to receive a phone call with the directions. Ramirez claims this is the first time he's smuggled illegal aliens. When asked about the handgun, Ramirez claims he was willing to point it at agents in order to get shot.

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**CONTINUATION:**

**MATERIAL WITNESSES STATEMENTS:**

Armando Aurelio Patricio Chanax-Ajitas and Rovinson Ortiz-Lala were read their Miranda Rights. Both understood and agreed to provide a sworn statement without the presence of an attorney.

Chanax, a citizen of Guatemala, stated his family made the smuggling arrangements and was to pay 60,000 Quetzales. He was smuggled into the United States on April 5, 2018 along with 20 other people. Chanax claims the guide instructed them to walk towards a levee and a vehicle was going to pick them up. Chanax indicated that a red vehicle arrived and he jumped in the back passenger side. Chanax identified Ramirez, through a photo lineup, as the driver of the vehicle.

Ortiz, a citizen of Ecuador, stated he made the smuggling arrangements and paid \$6,000 USD. After crossing the river along with several others, Ortiz stated they walked for several minutes until the guide instructed them to board a red vehicle. Ortiz identified Ramirez, through a photo lineup, as the driver of the vehicle.